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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

DECLARATION OF MARC
WOLSTENHOLME- TO PROVIDE
EVIDENCE OF THE FUNCTIONAL
CAPABILITY OF THE RIOT FORGE
DEVELOPER PORTAL TO ACCEPT LONG-
FORM NARRATIVE SUBMISSIONS AT
THE TIME OF PLAINTIFF'S ACTUAL
SUBMISSION, BEFORE AND AFTER.

Dated this: April 25, 2025

M. WOLSTENHOLME.

[MARC WOLSTENHOLME]

DECLARATION OF MARC WOLSTENHOLME- TO PROVIDE EVIDENCE OF THE FUNCTIONAL
CAPABILITY OF THE RIOT FORGE DEVELOPER PORTAL TO ACCEPT LONG-FORM NARRATIVE
SUBMISSIONS AT THE TIME OF PLAINTIFF'S ACTUAL SUBMISSION, BEFORE AND AFTER.

DECLARATION OF MARC WOLSTENHOLME

I, Marc Wolstenholme, declare under penalty of perjury as follows:

1. Purpose of Declaration

This declaration is submitted to provide evidence of the functional capability of the Riot Forge developer portal to accept long-form narrative submissions at the time of Plaintiff's actual submission in April 2020. This is submitted in response to Defendant's claims suggesting an inability to receive or process such materials.

2. Wayback Machine Archive – December 10, 2019

A preserved snapshot from the Internet Archive's Wayback Machine dated December 10, 2019, and on many dates before and after April 2020, demonstrates that the Riot Forge portal was live and allowed for the entry and submission of long-form content. The form permitted users to include extended narrative excerpts, titles, and contact information. Attached as Exhibit A is a screenshots demonstrating this capability. This evidence is presented to establish that Riot's systems were fully capable of receiving complete manuscript material, including those of the Plaintiff.

1 **3. Plaintiff's Actual Submission in April 2020**

2 Plaintiff's submission of excerpts and full content from 'Bloodborg: The Harvest'

3 occurred via the Riot Forge submission portal in April 2020. The Plaintiff used the same

4 structure and interface as captured in the December 2019 Wayback Machine snapshot. This

5 supports the factual assertion that Riot had the technical and procedural means to access the

6 Plaintiff's submitted material.

7

8 Moreover, Riot produced Exhibit B - Wayback Machine of Riot Forge as

9 evidence in a settlement hearing to misguide the Judge on the issue of access, again lying to the

10 court and abusing the court and the Plaintiff's time and money and rendering the conference a

11 litigation battle over access.

12

13 Moreover, the Plaintiff has a number of videos showing that the whole of

14 Bloodborg could be submitted via the Portal.

15

16 **4. Conclusion**

17

18 The Plaintiff respectfully submits this declaration to affirm that Riot Forge's

19 developer portal was operational and functionally capable of accepting full-length submissions.

20 This supports the plausibility of Plaintiff's April 2020 submission being received and available

21 for internal review.

Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made are true and accurate

Executed on April 25, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

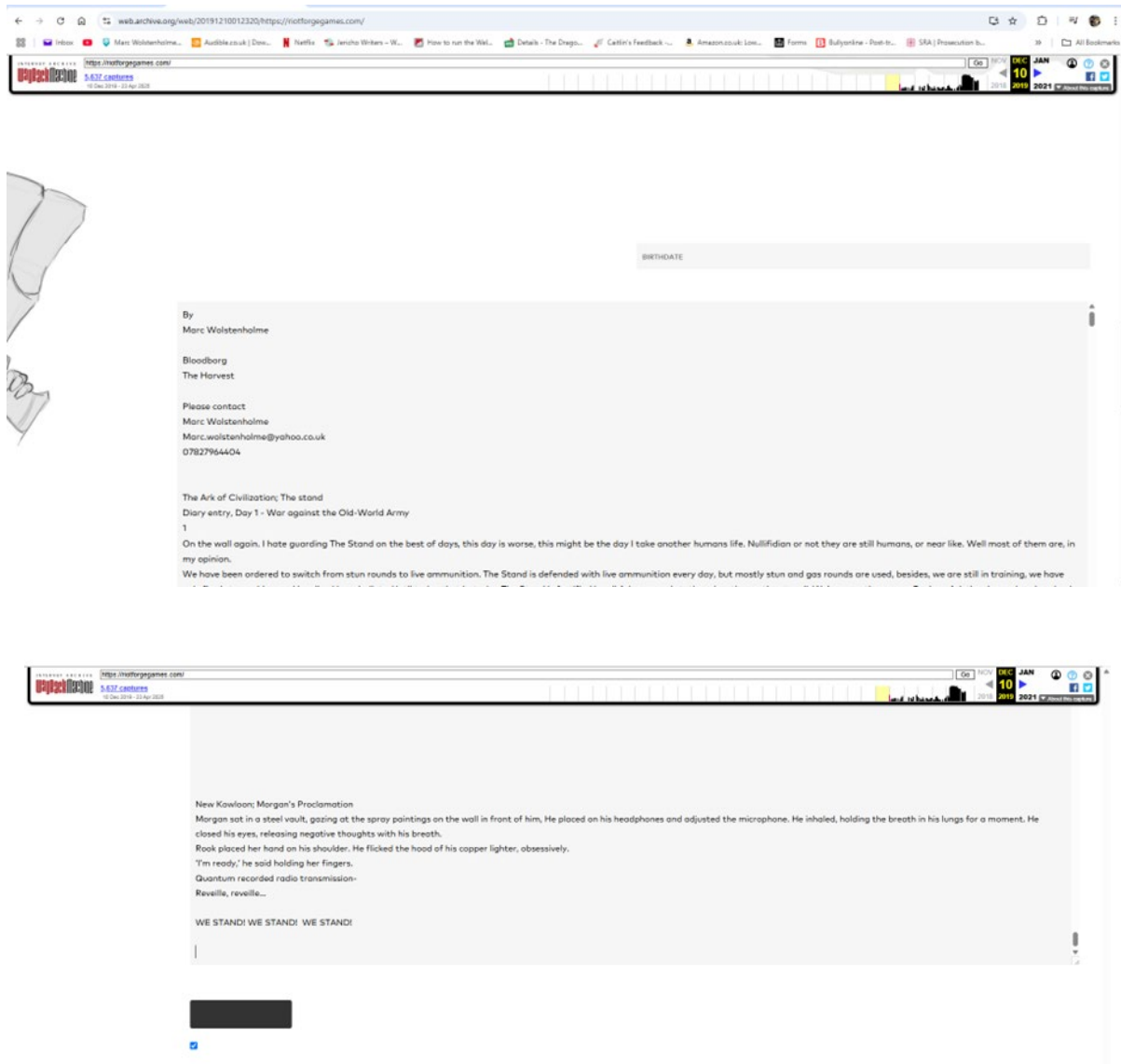
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Exhibit A – Riot Forge screenshots with the Bloodborg manuscript in it.



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